

**JUROR QUESTIONNAIRE FOR**  
**UNITED STATES V. MATTHEW CONNOLLY AND GAVIN BLACK**  
***PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLUE OR BLACK INK***

**Instructions**

The purpose of this questionnaire is to provide information to the attorneys in this case -- both the prosecutors and the defense attorneys -- so that they can determine whether you can be a fair and impartial juror. You are expected to give true and complete answers to every question.

Where indicated, please check the space for "Yes" or "No" and, as requested, furnish answers, explanations, and/or details in the spaces provided. Please print your answers in blue or black ink. Please do not leave any questions unanswered. If you do not understand a particular question or do not know the answer, please write either "I do not understand," or "I do not know" in the space provided for the answer. If there is not enough space for you to complete the answer to a question, please continue your answer in the margin next to the question or in the space provided at the end of the questionnaire. Do not write on the back of any page of the questionnaire. If you feel that a question does not apply to you, please write "N/A" in the space provided for the answer.

When you return to court, the Judge and/or the attorneys may ask specific questions about some of the information you provided in the questionnaire. When these follow-up questions are asked, if there are any matters that you do not wish to discuss in open court, please indicate that on the questionnaire where asked about your wish for privacy and the Judge will make arrangements for you to discuss these matters privately.

All of your responses will remain completely confidential. Do not discuss the questions or answers with anyone, including your fellow jurors. It is extremely important that your answers be your own individual answers.

## JUROR QUESTIONNAIRE

### **Background**

1. Name: \_\_\_\_\_ Juror No. \_\_\_\_\_
2. Age: \_\_\_\_\_
3. Are you:       Male       Female
4. County of Residence: \_\_\_\_\_
5. Years there: \_\_\_\_\_
6. City or Neighborhood of Residence \_\_\_\_\_
7. Years there: \_\_\_\_\_
8. Marital status: [CHECK ONE]  
 Single       Married       Live with partner  
 Widowed       Divorced/Separated
9. How far did you go in school? [check one]  
 Attended high school  
 Graduated from high school  
 Took some college classes/attended trade school  
 Received an associate's degree \_\_\_\_\_ (area)  
 Received a college degree \_\_\_\_\_ (major)  
 Took graduate courses \_\_\_\_\_ (area)  
 Received a graduate degree \_\_\_\_\_ (degree/area)
10. What is your current employment status?  
 Working full-time  
 Working part-time  
 Self-employed  
 Retired  
 Unemployed  
 Homemaker  
 Disabled  
 Student

11. Please list your current employer, position and number of years there. If you are not currently employed, provide this information for your most recent employment.

<u>Employer</u>	<u>Position</u>	<u>Yrs at Job</u>
_____	_____	_____

12. Please provide the same information for the two jobs before your most current/most recent job.

<u>Employer</u>	<u>Position</u>	<u>Yrs at Job</u>
_____	_____	_____
_____	_____	_____

13. What are your responsibilities at your current job (or most recent, if not currently working)?

---



---



---

14. Do you now or have you ever supervised other people at work?

Yes, 1-4 people     Yes, 5-10 people     Yes, over 10 people     No

15. Have you ever owned your own business?  Yes  No

16. How much education, training, or work or other experience do you have in each of the following areas? **[CHECK THE BOXES AS THEY APPLY]**

	<u>A lot</u>	<u>Some</u>	<u>A little</u>	<u>None</u>
Banking				
Economics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Securities/Investment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

17. If currently married or living with a partner, what is your spouse/partner's occupation?

---



---

1. 18. Do you own your home, rent or live with family or friends?

Own

Rent

Live with Family/Friends

19. Please list any groups and/or organizations to which you belong, including religious, social and professional associations:

---

---

20. What are your main sources of news? Please specify newspapers, news shows or internet news sites that you read or watch regularly:

---

---

21. Please list any (non-news) magazines/periodicals that you read and/or websites that you visit regularly:

---

---

22. Please list any television shows (including the news) that you watch on a regular basis:

---

---

23. Do you follow financial news?

Yes, regularly

Yes, not regularly

No

24. Have you ever invested money in stocks or bonds?

Yes, currently invested

Yes, in past but not now

No, never

25. Are you familiar with the Financial Crisis (also called the Credit Crisis) of 2007-2008?

Yes       No

IF YES:.

25a. Were you negatively affected by the crisis?

- Yes, affected, very negatively  
 Yes, affected somewhat negatively  
 No, not affected negatively

25b. Do you have any strong views about who was responsible for the crisis?

Yes       No

If Yes, please explain: \_\_\_\_\_

26. Have you ever taken out any of the following types of loans? If Yes, please indicate whether they were fixed rate loans for variable (floating) rate loans:

	<b>Yes</b>	<b>No</b>	<b>Fixed</b>	<b>Variable</b>
a. Mortgage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. HELOC (home equity line of credit)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Student loan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Auto loan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other loan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

27. To the best of your knowledge, have you ever had a loan that had interest rates tied to a benchmark known as LIBOR?

Yes       No

27a. If Yes, please explain:

---

---

28. Have you done any business with, or owned a bank or brokerage account at Deutsche Bank, a Federal Home Loan Bank (FHLB), JPMorganChase Bank, GoldmanSachs, BNY Mellon, Morgan Stanley, Wells Fargo, Keybank, Natixis, Merrill Lynch, Lehman Brothers, CDC Financial, Wachovia, Bear Stearns, Bank of America, Commerzbank or MBIA?

Yes       No

28a. If Yes, what type of transaction or account?

---

29. Have you, or has anyone you know, ever been employed by banks or financial reporting institutions such as Thomson Reuters or Bloomberg?

Yes       No

29a. If Yes, which institution and under what role?

---

---

30. Please indicate your prior service as a juror: **[CHECK ALL THAT APPLY]**

- Juror in criminal case in federal or state court
- Juror in civil case in federal or state court
- Member of a grand jury in federal or state court
- None

31. If you have any type of prior service as a juror, is there anything about your previous experience(s) that would make you want to serve or not serve on a jury again?

Yes       No

31a. If Yes, please explain:

---

---

32. Have you or any member of your family ever been a victim of a fraud?

Yes  No

32a. If Yes, please explain:

---

---

33. Have you or any member of your family ever been a victim of any other kind of crime?

Yes  No

33a. If Yes, please explain:

---

---

34. Have you or has any member of your immediate family ever been arrested or charged with a crime?

Yes                    No

34a. If Yes, please explain:

---

---

35. Have you or has any member of your immediate family been convicted of a crime or pled guilty to a crime other than routine traffic violations?

Yes                    No

35a. If Yes, please explain:

---

---

36. Have you ever participated in a criminal case in any of the ways described below?  
[CHECK ALL THAT APPLY]

- Complainant
- Defendant
- Witness for the prosecution

- Witness for the defense
- Any other capacity
- No, none of the above

37. Are you now, or have you ever been a law enforcement officer?

- Yes
- No

38. Have you ever worked as an employee of the U.S. Government in any capacity?

Yes       No

38a. If Yes, please indicate which Department you are/were in and what your job is/was:

---

---

39. Have you ever worked as part of the criminal justice system, e.g. judge, court personnel, probation officer, correction officer, etc.? This could include a Federal, state or local position.

Yes       No

39a. If Yes, please describe what you do/did:

---

---

40. Have you ever had any training or work experience in the law, for example, as a lawyer, judge, U. S. Attorney, paralegal, legal secretary, court reporter, or any other position in a law-related field?

Yes       No

40a. If Yes, please describe what you do/did:

---

---

41. Have you ever brought any claims or lawsuits against any federal, state, or local government employee or agency?

Yes       No

41a. If Yes, please explain and indicate the outcome:

---

---

42. Do you know anyone who works for the U.S. Department of Justice, or any of its components, such as the U.S. Attorney's Office?

Yes       No

42a. If Yes, whom do you know, and where does this person work? \_\_\_\_\_

---

43. Some of the witnesses in this case will be federal agents or other law enforcement officials. Would you tend to believe their testimony more than, the same as or less than that of an ordinary citizen?

Believe their testimony **more than** an ordinary citizen  
 Believe their testimony **the same as** an ordinary citizen  
 Believe their testimony **less than** an ordinary citizen

44. Some of the witnesses in this case may be attorneys. Would you tend to believe their testimony more than, the same as or less than that of other people?

Believe their testimony **more than** other people  
 Believe their testimony **the same as** other people  
 Believe their testimony **less than** other people

45. Some of the witnesses in this case may be cooperating witnesses – those who plead guilty to a crime and testify against a defendant in the hope that they will receive more lenient treatment by the government. Do you have any feelings about cooperating witnesses that would affect your ability to be fair and impartial in this case?

Yes       No

45a. If Yes, please explain:

---

---

**Knowledge of the Trial Participants**

46. Do you or does anyone close to you personally know Matthew Connolly, one of the individuals on trial, or any of his family members?

Yes       No

46a. If Yes, please explain how you personally know Mr. Connolly or members of his family:

---

---

47. Do you or does anyone close to you personally know Gavin Black, one of the individuals on trial, or any of his family members?

Yes       No

47a. If Yes, please explain how you personally know Mr. Black or members of his family:

---

---

48. Do you have any favorable or unfavorable opinions about prosecutors that might affect your ability to be a fair and impartial juror in this case?

Yes, I tend to think favorably of prosecutors  
 Yes, I tend to think unfavorably of prosecutors  
 No, I have no particular opinions either way

49. Do you personally know or have you heard about any of the people who are prosecuting this case?

Jessee C. Alexander-Hoeppner

Alison L. Anderson

Christina Brown

Mark J. Cipolletti

Christopher D. Jackson

Michael T. Koenig

Richard A. Powers

D. Brittain Shaw

Carol L. Sipperly

Daniel M. Tracer

- 49a. If you checked any of the names above, please explain:

---

---

50. Do you have any favorable or unfavorable opinions about criminal defense attorneys that might affect your ability to be a fair and impartial juror in this case?

- Yes, I tend to think favorably of defense attorneys
- Yes, I tend to think unfavorably of defense attorneys
- No, I have no particular opinions either way

51. Do you personally know or have you heard about any of the attorneys for the defense?

Kenneth M. Breen

Eduardo Gardea

Phara A. Guberman

Amanda Pober

Jane H. Yoon

Miriam L. Alnikoff

Scott B. Klugman

Seth L. Levine

Teena-Ann Sankoorikal

Ellen H. Sise

Dylan A. Stern

51a. If you checked any of the names above, please explain:

---

---

52. The judge presiding in this case is U.S. District Court Judge Colleen McMahon. Do you or does anyone close to you know Judge McMahon or any judge or court personnel in the federal or local courts?

- Yes
- No

52a. If Yes, whom do you know and how do you know them?

---

---

53. This trial will deal in part with the entities listed below. Do you know anything about any of them or have you had any dealings with them?

Bank of America  
Bank of England  
Bear Stearns  
BNY Mellon  
British Bankers' Association  
CDC Financial  
Commerzbank  
Deutsche Bank  
FHLB- Atlanta  
FHLB -Indianapolis  
FHLB – Boston  
Goldman Sachs  
ICAP  
JPMorganChase Bank  
Keybank  
Lehman Brothers  
Levine Lee LLP  
MBIA  
Morgan Stanley  
Merrill Lynch  
Natixis  
Paul Hastings LLP  
Thomson Reuters  
Tullet Prebon  
United States Federal Reserve  
Wachovia  
Wells Fargo

Yes       No

53a. If you checked any of the names above, please explain.

---

---

54. Please review the list attached to this questionnaire at Attachment A that provides the names of persons whom you may hear about during the trial. Do you know or have any connection with the individuals listed?

Yes       No

54a. If Yes, please explain how you know or recognize the individual(s) and describe your opinion of them:

---

---

### **Knowledge of This Case/Reactions to Issues**

It is possible that you have heard and/or read something about the case at some time. There is nothing wrong with having heard/read something about this case. It is important that you truthfully and fully answer the following questions concerning your knowledge about this case through the media or any other source.

55. Before today, had you heard or read anything, either through word of mouth or in the news media, about charges being brought against Matthew Connolly and Gavin Black?

Yes       No

55a. If Yes, please describe what you have heard or read.

---

---

55b. If Yes, how closely have you been following the case brought against Matthew Connolly and Gavin Black?

- Very closely
- Somewhat closely
- I have heard of the case but I have not been following it
- Not at all

55c. If Yes, from what news sources did you learn about this case?

---

---

55d. If Yes, what thoughts or opinions did you have concerning this case before coming here today, if any?

---

---

56. Before today, had you heard anything about allegations involving LIBOR, the London Inter-bank Offered Rate?

- Yes  
 No

56a. If Yes, what you have you heard?

---

---

57. If you have heard anything about LIBOR and allegations related to it, have you formed any opinions that would prevent you from being a fair and impartial juror in this case?

- Yes       No

57a. If Yes, please explain:

---

---

58. Mr. Connolly and Mr. Black are charged with making false and misleading statements to obtain money and property from those with whom they conducted deals, through the manipulation of LIBOR. They pleaded not guilty to this charge and are therefore presumed innocent unless proven guilty. Have you formed any opinions about Mr. Connolly or Mr. Black that would prevent you from being a fair and impartial juror in this case?

- Yes       No

58a. If Yes, please explain:

---

---

59. As you have read, this case involves allegations of false statements and LIBOR manipulation. Is there anything about that subject matter that would prevent you from being a fair and impartial juror in this case?

Yes       No

59a. If Yes, please explain:

---

---

60. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person?

Yes       No

60a. If Yes, please explain:

---

---

61. The Court will instruct you that you may draw no inference against the defendants from the fact that they have been indicted. Would you have any difficulty following the Court's instructions on this point?

Yes       No

61a. If Yes, please explain:

---

---

62. Under the United States Constitution, a person accused of a crime does not have to testify in his defense or present any witnesses and his silence may not be used against him. Can you follow this constitutional requirement?

Yes       No

62a. If Yes, please explain:

---

---

63. Do you have a problem with the concept that the defendants must be presumed innocent and the government must prove the guilt of the defendants beyond a reasonable doubt? (*The Court will give specific instructions concerning reasonable doubt if you are selected as a juror.*)

Yes       No

64. This trial is scheduled to begin September 17 and is expected to last about three weeks. The trial will take place Monday to Thursday, from 9:30 a.m. to 5:00 p.m. Is there an important reason why you could not serve on a jury for this period of time?

Yes       No

64a. If Yes, please explain:

---

---

### **Personal Concerns**

65. Is there anything (e.g. health, job, family obligations, etc.) that would interfere with your ability to serve as a juror in this case?

Yes       No

65a. If Yes, please explain:

---

---

66. Do you have any difficulty with your eyesight or hearing?

Yes       No

66a. If Yes, please explain:

---

---

67. Do you have any difficulty reading or understanding the English language?

Yes       No

68. Is there anything in your personal experience or anything about your beliefs or values, that has not been covered in this questionnaire but which might affect your ability to judge the facts and provide a fair verdict in a case that deals with an accusation of LIBOR manipulation?

Yes       No

68a. If Yes, what are those issues?

---

---

69. Is there anything else that you think the judge or parties should know about you?

Yes       No

69a. If Yes, please explain:

---

---

70. Are there any questions that you would prefer to discuss privately? If so, please indicate the question numbers here:

---

---

### **Court Order**

You are ordered by the Court not to seek out, read, or research information about Matthew Connolly and Gavin Black, the Defendants in this case, or the charges against him, including Internet research. You must also refrain from (1) listening to or viewing any radio or television show that may reference Matthew Connolly and Gavin Black; and (2) avoid reading or viewing any newspaper articles, online reports, or social media that may reference Matthew Connolly and Gavin Black.

When you return to the courthouse for jury selection, you will be questioned under oath about your compliance with the above instructions. You are expected to advise the Judge as soon as you become aware of any juror's violation of these instructions, whether before or during the trial.

I hereby declare under penalty of perjury that the foregoing answers set forth in the juror questionnaire are true and correct to the best of my knowledge and belief. I have not discussed any answers with others or received assistance in completing the questionnaire. I have answered all of the above questions in this jury questionnaire myself.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

---

Signature

---

Print Name

Extra space for your answers to any of the questions. Please indicate question number:

**Names of Persons About Whom You May Hear at this Trial**

Anthony Allen  
Jonathan Arnold  
Michael Barletta  
Marc Beaumont  
Manolo Bernardo  
Christian Bittar  
Sebastian Bittar  
Gavin Campbell Black  
Patrick M. Boone  
Mark Bridgewater  
Jeroen Brinkman  
Gary Allan Brown  
Matthew Connolly  
Michael Ross Curtler  
Gurjit Dehl  
Kyle Dornbos  
Matthias Dux  
John Ewan  
Andrew Finch  
Jesse Fogarty  
Mary Kay Girimonti  
Neil Guy  
John Hilty  
Dennis Jarecke  
Dean Johnson  
Michael P. Kelly  
James King  
Cindy Konich  
Rupert Labrum  
Benjamin Levy  
George E. Maroun

Shivani Mathur  
Alex Merriman  
Alex Montagu  
Mark Moran  
Scott Moses  
Michael J. McGillicuddy  
Kendra S. McLamb  
David Nicholls  
Timothy Parietti  
David Park  
Yves Paturel  
Edward Patrylow  
Joseph Randazzo  
Steven Reich  
Walter Ricciardi  
Werner Rietze  
Jennifer Riker  
Andrew Rivas  
Christopher Rooke  
Jeffrey A. Sapp  
Sally Scutt  
Bernard Sharpe  
Olesya Skofenko  
Andrew Smoler  
Lee Stewart  
Daniel J. Tempone  
John Tipper  
Jeffrey Weeks  
Thomas Westerlund  
Guy Weston Edwards  
Thomas Youle  
Debra Young